

Chancery Court
Second Monday in May
Last Monday in November

Circuit Court
First Monday in January
Third Monday in June

MRS. ERLINE D. FORTNER
CLERK OF THE CHANCERY AND CIRCUIT COURTS
ISSAQUENA COUNTY
P.O. BOX 27
MAYERSVILLE, MISSISSIPPI 39113
TELEPHONE (662) 873-2761
FAX (662) 873-2061

STATE OF MISSISSIPPI

COUNTY OF ISSAQUENA

I, ERLINE D. FORTNER, CIRCUIT CLERK IN AND FOR THE COUNTY AND STATE AFORESAID, DO HEREBY CERTIFY THAT THE ATTACHED TWENTY-NINE PAGES ARE TRUE AND COPIES OF ISSAQUENA CIRCUIT COURT CAUSE NO. 2014-01 FILED ON MARCH 26, 2014 IN SAID CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI.

GIVEN UNDER MY HAND AND OFFICIAL SEAL this 1st day of APRIL,

2014.



Erline D. Fortner
ERLINE D. FORTNER, CIRCUIT CLERK

CAUSE NO. 2014-01
CIRCUIT COURT ISSAQUENA COUNTY, MS
29 PAGES (Twenty-Nine)

COVER SHEET

Civil Case Filing Form

(To be completed by Attorney/Party
Prior to Filing of Pleading)

Mississippi Supreme Court
Administrative Office of Courts

Form AOC/01
(Revised 1/1/2001)

Court Identification

Docket Number

218911
County # Judicial Court ID
District (CH, CI, CO)

Case Year

Docket Number

2014

01

Local Docket ID

032614
Month Date Year

Case Number if filed prior to 1/1/94

This area to be completed by clerk

IN THE CIRCUIT

COURT OF ISSAQUNA

COUNTY

Short Style of Case: Angel Jordan et al v. Issaquena County, Mississippi et al

Party Filing Initial Pleading: Type/Print Name David M. Sessions

MS Bar No. 6714

Check (✓) if Not an Attorney

Check (✓) if Pro Hac Vice

Signature David M. Sessions

Compensatory Damages Sought: \$

Punitive Damages Sought: \$

Is Child Support contemplated as an issue in this suit?

Yes No

If "yes" is checked, please submit a completed Child Support

Information Sheet with Final Decree/Judgment

PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM

Individual Jordan

Last Name

First Name

(Angela)

Maiden Name, if Applicable

Middle Init.

Jr/Sr/III/IV

Address of Plaintiff Vicksburg, MS

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of

Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:

D/B/A / Agency

Business

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below:

D/B/A:

DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM

Individual

Last Name

First Name

()

Maiden Name, if Applicable

Middle Init.

Jr/Sr/III/IV

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:

D/B/A / Agency

Business Issaquena County, Mississippi

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A:

ATTORNEY FOR THIS DEFENDANT: Bar No. or Name: Pro Hac Vice (✓)

(if known)

In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.

Business/Commercial

- Accounting (Business)
- Bankruptcy
- Business Dissolution - Corporation
- Business Dissolution - Partnership
- Debt Collection
- Employment
- Examination of Debtor
- Execution
- Foreign Judgment
- Garnishment
- Pension
- Receivership
- Replevin
- Stockholder Suit
- Other

Domestic Relations

- Child Custody/Visitation
- Child Support
- Contempt
- Divorce: Fault
- Divorce: Irreconcilable Differences
- Domestic Abuse
- Emancipation
- Modification
- Paternity
- Property Division
- Separate Maintenance
- Termination of Parental Rights
- UIFSA (formerly URESA)
- Other

Contract

- Breach of Contract
- Installment Contract
- Insurance
- Product Liability under Contract
- Specific Performance
- Other

- Probate
- Accounting (Probate)
- Birth Certificate Correction
- Commitment
- Conservatorship
- Guardianship
- Heirship
- Intestate Estate
- Minor's Settlement
- Muniment of Title
- Name Change
- Power of Attorney
- Testate Estate
- Will Contest
- Other

Statutes/Rules

- Bond Validation
- Civil Forfeiture
- Declaratory Judgment
- ERISA
- Eminent Domain
- Extraordinary Writ
- Federal Statutes
- Injunction or Restraining Order
- Municipal Annexation
- Racketeering (RICO)
- Railroad
- Seaman
- Other

Appeals

- Administrative Agency
- County Court
- Hardship Petition (Driver License)
- Justice Court
- MS Employment Security Comm'n
- Municipal Court
- Oil & Gas Board
- Workers' Compensation
- Other

Children and Minors - Non-Domestic

- Adoption - Noncontested
- Consent to Abortion for Minor
- Removal of Minority
- Other

Torts-Personal Injury

- Bad Faith
- Fraud
- Loss of Consortium
- Malpractice - Legal
- Malpractice - Medical
- Negligence - General
- Negligence - Motor Vehicle
- Products Liability
- Wrongful Death
- Other

Mass Tort

- Asbestos
- Chemical Spill
- Dioxin
- Hand/Arm Vibration
- Hearing Loss
- Radioactive Materials
- Other

Real Property

- Adverse Possession
- Ejectment
- Eminent Domain
- Judicial Foreclosure
- Lien Assertion
- Partition
- Receiver Appointment
- Tax Sale: Confirmation/Cancellation
- Title, Boundary &/or Easement
- Other

Civil Rights

- Elections
- Habeas Corpus
- Post Conviction Relief
- Prisoner
- Other

ATTEST
A TRUE COPY

4-1-2014

ATTEST
Under Contract
A TRUE COPY
4-1-2014
[Signature]
CLERK
MONROE COUNTY, MS.

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPIJUDICIAL DISTRICT, CITY OF

Docket No. _____ - Docket No. If Filed _____
 File Yr _____ Chronological No. _____ Clerk's Local ID _____
 Prior to 1/1/94 _____

PLAINTIFFS IN REFERENCED CAUSE - Page 1 of _____ Plaintiffs Pages
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff #2:

Individual: Jordan Last Name Hannah First Name (Nicole Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____
 Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Plaintiff #3:

Individual: Jordan Last Name Michael First Name (Maiden Name, if Applicable _____) Middle Init. Jr/Sr/III/IV

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____
 Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Plaintiff #4:

Individual: _____ Last Name _____ First Name _____ (_____ Maiden Name, if Applicable _____) Middle Init. Jr/Sr/III/IV

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____
 Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

JUDICIAL DISTRICT, CITY OF _____

Docket No: _____ - _____ Docket No. If Filed
 File Yr Chronological No. Clerk's Local ID Prior to 1/1/94 _____ Jr/Sr/III/IV

DEFENDANTS IN REFERENCED CAUSE - Page 1 of _____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant #2:

Individual: _____ (_____) _____ Maiden Name, if Applicable _____ Middle Init. Jr/Sr/III/IV
 Last Name First Name _____

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business Issaquena County Regional Correctional Facility

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: _____ (_____) _____ Maiden Name, if Applicable _____ Middle Init. Jr/Sr/III/IV
 Last Name First Name _____

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: _____ (_____) _____ Maiden Name, if Applicable _____ Middle Init. Jr/Sr/III/IV
 Last Name First Name _____

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

VARNER PARKER & SESSUMS, P.A.
ATTORNEYS AT LAW
A PROFESSIONAL ASSOCIATION

J. MACK VARNER
DAVID M. SESSUMS
R. EUGENE PARKER, JR. - rep@vpslaw.com
CLIFFORD C. WHITNEY III - ccw@vpslaw.com
PENNY B. LAWSON - plawson@vpslaw.com

March 25, 2014

1110 JACKSON STREET
POST OFFICE BOX 1237
VICKSBURG, MS 39181

TELEPHONE (601) 638-8741
FACSIMILE (601) 638-8666
www.vpslaw.com

Ms. Earline Fortner
Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

VIA Hand Delivery

RE: Angela Jordan et al v. Issaquena County, Mississippi et al
Issaquena County Circuit No.: 8014-01

Dear Ms. Fortner:

Enclosed with this letter please find the following:

1. Original and five (5) copies of Complaint;
2. Original and two (2) copies of Summons for service upon Issaquena County Regional Correctional Facility by service of process on Richard Jones, Sheriff of Issaquena County, Mississippi;
3. Original and two (2) copies of Summons for service upon Issaquena County Regional Correctional Facility by service of process on Earline Fortner, Chancery Clerk of Issaquena County, Mississippi;
4. Original and two (2) copies of Summons for service upon Issaquena County, Mississippi by service of process on Richard Jones, Sheriff of Issaquena County, Mississippi;
5. Original and two (2) copies of Summons for service upon Issaquena County, Mississippi by service of process on Earline Fortner, Chancery Clerk of Issaquena County, Mississippi;
6. Civil Cover Sheet;
7. Our firm check for initial filing fee.

Because of your dual capacity as both the Chancery Clerk and as the Circuit Clerk of Issaquena County, Mississippi I am requesting that you first file and issue each of the above referenced summons in your capacity as the Circuit Clerk of Issaquena County, Mississippi and then

handing the executed summons over to Mr. Lance Tompkins, (who is delivering these documents to your offices as Circuit Clerk) and then allowing Mr. Tompkins to serve the summon and complaint on you in your capacity as Chancery Court Clerk of Issaquena County, Mississippi and allowing him to likewise deliver the summons down the hall to Sheriff Jones and then make his returns into your office as Circuit Clerk. (These emphasis are for the benefit of Mr. Thompkins).

Mr. Tompkins will have an additional firm check on him to make out an deliver to you should any additional fees be needed.

I appreciate your assistance, cooperation and understanding in this unique situation and should you have any question please do not hesitate to contact me.

With best regards, I am,

Very truly yours,


DAVID M. SESSUMS

DMS/ajn
Enclosures

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

VS.

PLAINTIFFS

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

COMPLAINT

COMES NOW Angela Jordan and Hannah Nicole Jordan and Ann Michael Jordan by and through their Mother and next friend Angela Jordan, through counsel, and file this their Complaint against Issaquena County, Mississippi and Issaquena County Regional Correctional Facility showing unto the Court as follows:

PARTIES AND JURISDICTION

1. Prior to his death on April 7, 2013, Tony Jordan was a 46 year old adult resident citizen of Warren County, Mississippi. Angela Jordan is the surviving spouse of Tony Jordan and Hannah Nicole Jordan and Ann Michael Jordan are the surviving children of Tony Jordan and together they are all of the sole heirs-at-law and sole wrongful death beneficiaries of Tony Jordan.

2. Issaquena County Regional Correctional Facility is a county unit of Issaquena County, Mississippi organized and existing under the laws of the State of Mississippi which may be served by process on Richard Jones as Sheriff of Issaquena County, Mississippi and on Earline Fortner, Chancery Clerk of Issaquena County, Mississippi and Issaquena County, Mississippi is a subdivision of the State of Mississippi, upon which process may be had by service upon Earline Fortner, Chancery Clerk of Issaquena County, Mississippi, at her offices located in Mayersville,



FILED March 26 2014
John Deacon, Jr.
CLERK

Mississippi and on Richard Jones as Sheriff of Issaquena County, Mississippi.

3. Does 1- 10 are the unknown employees of Defendant, Issaquena County Regional Correctional Facility who denied Tony Jordan medical treatment.

4. This Court has jurisdiction of the subject matter hereof and venue is proper in Issaquena County, Mississippi.

FACTS

5. On March 28, 2013, Tony Jordan was taken into the custody of the Vicksburg, Mississippi Police Department.

6. On March 29, 2013, Tony Jordan was transferred by the Vicksburg Police Department to Issaquena County Regional Correction Facility (hereinafter "ICRCF") which is owned and operated by Issaquena County, Mississippi.

7. While incarcerated at ICRCF Tony Jordan suffered severe life threatening personal injury caused either by persons at the facility or by Tony Jordan himself.

8. After receiving severe, life threatening personal injury Tony Jordan required medical treatment but did not receive same.

9. Thereafter, Tony Jordan was transported by the Vicksburg Police Department to River Region Medical Center located in Vicksburg, Mississippi.

10. Thereafter, Tony Jordan was transported from the River Regional Medical Center in Vicksburg, Mississippi to University Medical Center located in Jackson, Mississippi.

11. On April 7, 2013, Tony Jordan died in University Medical Center from injuries received at ICRCF.

12. The injuries received by Tony Jordan in ICRCF were the proximate cause or a proximately contributing cause to the death of Tony Jordan on April 7, 2013.

13. Does 1 though 10 are employed by ICRCF. Plaintiffs reserve the right to name such employees upon ascertaining their identity.

COUNT ONE

14. Plaintiffs incorporate the allegations of all previous paragraphs.

15. Defendants had a common law duty to render necessary and required medical treatment to Tony Jordan while in their custody.

16. Defendants duty to render necessary and required medical treatment to Tony Jordan constituted a ministerial act and did not involve an element of choice and did not constitute a discretionary act or acts and involved no social, economical or political policy decisions.

17. Defendants wilfully and recklessly disregarded their duty and obligation to provide required and necessary medical treatment to Tony Jordan, or in the alternative, willfully and recklessly delayed providing necessary and required medical treatment to Tony Jordan.

18. Defendants' aforesaid act were in deliberate disregard of the safety and well being of Tony Jordan.

19. The aforesaid acts of Defendants indicated and constitute a deliberate indifference to protect Tony Jordan and/or to provide adequate medical treatment to Tony Jordan.

20. The aforesaid acts of Defendants agents and employees, Does 1 -10, are outside their usual course and scope of their employment for which Defendant and Defendant's employees are liable.

21. The aforesaid acts of Defendants were the proximate cause or proximate contributing cause of the death of Tony Jordan of which the Defendants are liable to the wrongful death beneficiaries of Tony Jordan.

COUNT TWO
BREACH OF STATUTE

22. Plaintiffs incorporate all of the allegations of the preceding paragraphs.
23. Section 47-1-27 (Miss. Code Ann. 1972) provides that any person having custody of any county prisoner, such as Tony Jordan, who shall wilfully fail to furnish medical attention to a person such as Tony Jordan shall be deemed guilty of a misdemeanor and on conviction fined in a sum of not more than \$500.00 and shall be imprisoned for not less than one (1) month or shall suffer both such fine and imprisonment.
24. Section 47-1-57 Miss. Code Ann. (1972) provides that when any person such as Tony Jordan shall be confined to jail and in need of medical or surgical aid that such aid shall forthwith be provided.
25. Section 47-1-59 Miss. Code Ann. (1972) provides that when any inmate such as Tony Jordan requires medical treatment or hospitalization that such medical treatment or hospitalization shall be forthwith provided.
26. That Defendants breached each of their duties under the aforesaid statutes.
27. The provisions of the aforesaid statutes and the requirements thereof are not discretionary, but are mandatory and ministerial.
28. Where there is no statute covering the common law prevails but where a specific statute exists such statute, such as the above referenced statutes, takes precedence over common law.
29. The aforesaid actions of Defendants constitute a wilful and reckless disregard of the known rights of Tony Jordan, constituted a deliberate disregard for the safety and well being of Tony Jordan, constituted deliberate indifference to Defendants' obligation to protect Tony Jordan and/or to provide and/or not delay adequate medical treatment to Tony Jordan.

30. That the aforesaid breaches of statute were the proximate or proximate contributing cause to the death of Tony Jordan.

31. That the requirements of said statutes are ministerial, did not involve choice, and do not involve any discretionary acts on the part of Defendants and do not involve any social, economical or political policy decisions.

32. Tony Jordan was within the class of persons designed to be protected by the aforesaid statutes.

33. Tony Jordan suffered severe personal injury and death as a result of Defendants' breach of the aforesaid statutes and, further Plaintiffs have been caused to suffer loss, injury and damages as a result of the aforesaid breaches by the Defendants.

COUNT THREE

34. Plaintiffs adopt the allegations of all preceding paragraphs.

35. That the aforesaid actions and omissions of Defendants constituted violation of the rights of Tony Jordan under the Eighth Amendment of the United States Constitution.

36. That the aforesaid actions and omissions of Defendants amounted to deliberate indifference to the need of Tony Jordan to adequate medical care and treatment and the aforesaid actions of Defendants are evidence of a deliberate indifference to the serious medical needs of Tony Jordan in violation of Tony Jordan's right under the Eighth Amendment to the United States Constitution.

37. That the aforesaid deprivation of constitutional rights of Tony Jordan were the proximate cause or proximate contributing cause of the injuries and subsequent death of Tony Jordan and to the damages sustained by Tony Jordan and to the damages sustained by Plaintiffs herein.

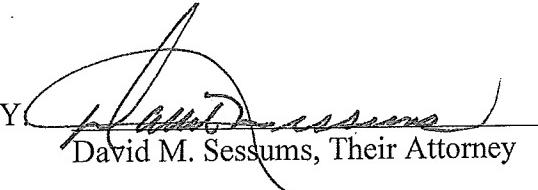
DAMAGES

38. That Plaintiffs have suffered damages as a direct and proximate result of Defendants aforesaid acts and omissions including, but not limited to, personal injuries to Tony Jordan, and Plaintiff's loss of the love, companionship, affection and support of Tony Jordan.

WHEREFORE PREMISES CONSIDERED, Plaintiffs demand judgment of and from Defendants in such sum as may be determined by the trier of fact, together with their reasonable attorneys fees with all costs herein assessed unto Defendants.

Respectfully submitted,

ANGELA JORDAN, ET AL

BY 

David M. Sessums, Their Attorney

OF COUNSEL:

DAVID M. SESSUMS, MSB #6714
VARNER, PARKER & SESSUMS, P.A.
Post Office Box 1237
1110 Jackson Street
Vicksburg, Mississippi 39183
Telephone: 601.638.8741
Facsimile: 601.638.8666

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

VS.

PLAINTIFFS

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this the 26 day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Richard Jones D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the _____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the _____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 2014.

NOTARY PUBLIC
My Commission Expires: _____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

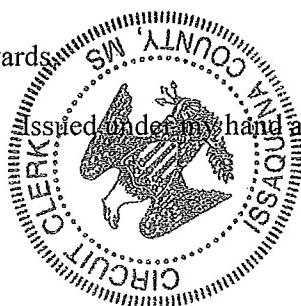
NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this 24th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Kathy Dyer D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the _____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the _____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 2014.

NOTARY PUBLIC
My Commission Expires: _____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

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MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this the 20th day of May, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Hobbi Danner D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the _____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the _____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 2014.

NOTARY PUBLIC
My Commission Expires: _____

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

VS.

PLAINTIFFS

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

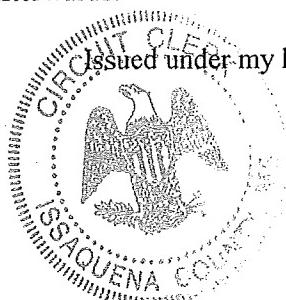
NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this the 30th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Robbie Dunen D.C.

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

() I personally delivered copies of the Summons and Complaint on the _____ day of _____, 2014 to _____.

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the _____ day of _____, 2014.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 2014.

NOTARY PUBLIC
My Commission Expires: _____

FEE BILL, CIVIL CASES, CIRCUIT COURT

STATE OF MISSISSIPPI

ISSAQENA COUNTY

CASE NO. 2014-04

Angela Jordan et al
vs.
Issaqena County, MS

Nº 1107

LAWRENCE-GREENWOOD 20666

Jury Tax	\$ 3.00
Court Reporter's Fee	10.00
Law Library	3.50
State Court Education Fund	2.00
Clerk's Fee	25.00
Sub-Total	43.50
Sheriff's Fee	
Fees of other Sheriff's	
State Comm. or Officers	#
Other	
Other	<u>Court Costs</u>
Other	
Other	
Other	
Marriage License	(Domestic Violence 14.00 Clerk's Fee 6.00)
Amount Paid	
Amount Due	

How Paid: CashPayment received from Warren Parker & Sessions
this the 26 day of March A.D., 2014 Dollars \$ 160.00 Check Money OrderBy D. C. To Porter Circuit Clerk

PRESCRIBED BY MISS. STATE DEPT. OF AUDIT

VARNER PARKER & SESSUMS, P.A.
ATTORNEYS AT LAW
A PROFESSIONAL ASSOCIATION

J. MACK VARNER
DAVID M. SESSUMS
R. EUGENE PARKER, JR. - rep@vpslaw.com
CLIFFORD C. WHITNEY III - ccw@vpslaw.com
PENNY B. LAWSON - plawson@vpslaw.com

March 27, 2014

1110 JACKSON STREET
POST OFFICE BOX 1237
VICKSBURG, MS 39181

TELEPHONE (601) 638-8741
FACSIMILE (601) 638-8666
www.vpslaw.com

Ms. Earline Fortner
Issaquena County Circuit Clerk
P.O. Box 27
Mayersville, MS 39113

RE: Angela Jordan et al v. Issaquena County, Mississippi et al
Issaquena County Circuit No.: 2014-01

Dear Ms. Fortner:

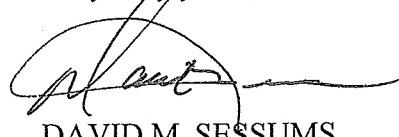
Enclosed herewith please find the following:

1. Original and one (1) copy of Summons/Return served upon Richard Jones, Sheriff of Issaquena County, Mississippi on behalf of Issaquena County Regional Correctional Facility;
2. Original and one (1) copy of Summons/Return served upon Earline Fortner, Chancery Clerk of Issaquena County, Mississippi on behalf of Issaquena County Regional Correctional Facility;
3. Original and one (1) copy of Summons/Return served upon Richard Jones, Sheriff of Issaquena County, Mississippi on behalf of Issaquena County, Mississippi;
4. Original and one (1) copy of Summons/Return served upon Earline Fortner, Chancery Clerk of Issaquena County, Mississippi on behalf of Issaquena County, Mississippi.

Please mark the copies of each Summons "filed" and return same to me in the self addressed stamped envelope enclosed herewith for your convenience.

With best regards, I am,

Very truly yours,



DAVID M. SESSUMS

DMS/ajn
Enclosures

IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

VS.

PLAINTIFFS

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

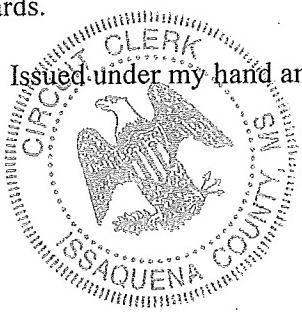
NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following attorney for
the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this 26th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Dobbi Duran D.C.

FILED March 31 2014
Laura Sotter
CLERK

RETURN

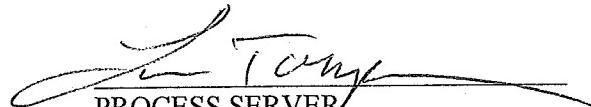
STATE OF MISSISSIPPI
COUNTY OF WARREN

(I personally delivered copies of the Summons and Complaint on the 26th day of March, 2014 to Richard Jones

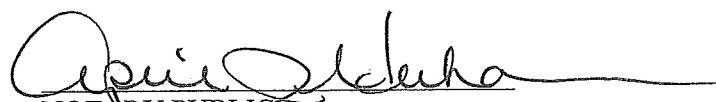
(After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the ____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the ____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

(I was unable to serve the Summons and Complaint.

This the 26th day of March, 2014.


L. Tony
PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 26 day of March, 2014.


NOTARY PUBLIC
My Commission Expires:



IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

VS.

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

PLAINTIFFS

NO. 2014-01

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY, MISSISSIPPI
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

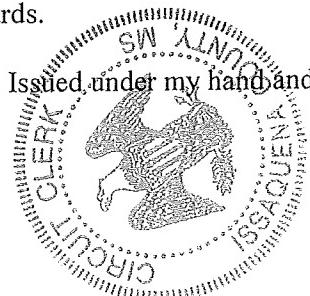
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the Plaintiff(s): **DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this 20th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Earline Fortner D.C.

FILED March 31 2014
Earline Fortner
CLERK

RETURN

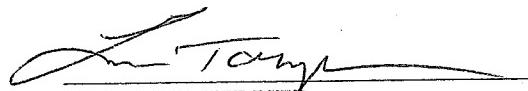
STATE OF MISSISSIPPI
COUNTY OF WARREN

(I personally delivered copies of the Summons and Complaint on the 26 day of March, 2014 to Earline Fortner

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the 26 day of March, 2014.


Linda Tandy
PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 26 day of March, 2014.


NOTARY PUBLIC
My Commission Expires: _____



IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN.

VS.

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

PLAINTIFFS

NO. 2014-01

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Richard Jones, Issaquena County Sheriff
129 Court Street
Mayersville, MS 39113

NOTICE TO DEFENDANT(S)

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Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.**

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afterwards.



Issued under my hand and seal of this court this the 20th day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Kelli Danner D.C.

FILED March 31 2014
Leanne Fortner
CLERK

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

(I personally delivered copies of the Summons and Complaint on the 26th day of March, 2014 to Richard Tros

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the 26th day of March, 2014.

J. Tang
PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 26 day of March, 2014.

April J. Neihaus
NOTARY PUBLIC
My Commission Expires: _____



IN THE CIRCUIT COURT OF ISSAQUENA COUNTY, MISSISSIPPI

ANGELA JORDAN, HANNAH NICOLE
JORDAN AND ANN MICHAEL JORDAN
BY AND THROUGH THEIR MOTHER AND
NEXT FRIEND ANGELA JORDAN

PLAINTIFFS

VS.

NO. 2014-01

ISSAQUENA COUNTY, MISSISSIPPI AND
ISSAQUENA COUNTY REGIONAL
CORRECTIONAL FACILITY AND
DOES 1 - 10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: ISSAQUENA COUNTY REGIONAL CORRECTIONAL FACILITY
c/o Earline Fortner, Issaquena County Circuit Clerk
129 Court Street
Mayersville, MS 39113

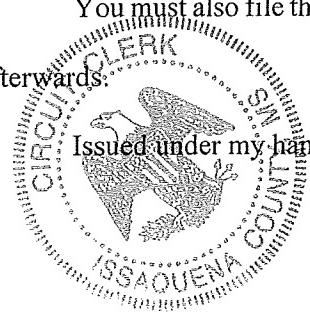
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the Plaintiff(s): DAVID M. SESSUMS, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson
Street, Post Office Box 1237, Vicksburg, Mississippi, 39181, (601) 638-8741.

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of this Summons and Complaint or a judgment of default will be entered against you for the money or other
things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time
afterwards.



Issued under my hand and seal of this court this the 24 day of March, 2014.

CIRCUIT CLERK OF ISSAQUENA COUNTY,
MISSISSIPPI

BY: Earline D. Danner D.C.

FILED March 31 2014
Earline Danner
CLERK

RETURN

STATE OF MISSISSIPPI
COUNTY OF WARREN

(I personally delivered copies of the Summons and Complaint on the 26th day of March, 2014 to Earline Foster

() After exercising reasonable diligence I was unable to deliver copies of the Summons and Complaint to _____ within _____ County, Mississippi. I served the Summons and Complaint on the _____ day of _____, 20____ at the usual place of abode of said _____, a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the _____ day of _____, 20____ I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() I was unable to serve the Summons and Complaint.

This the 26th day of March, 2014.


PROCESS SERVER

SWORN TO AND SUBSCRIBED before me this 26th day of March, 2014.




NOTARY PUBLIC
My Commission Expires: _____